

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,
LI MINJUN,
TU LAN,
ZHU FENG,
also known as “Johnny Zhu,”
KUANG ZEBIN,
also known as “Vincent Kuang,”
MICHAEL MCMAHON,
ZHAI YONGQIANG,
ZHENG CONGYING and
ZHU YONG,
also known as “Jason Zhu,

Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

Filed Electronically

**CERTIFICATION OF MARY MARTHA
MCMAHON**

I, **MARY MARTHA MCMAHON**, being of full age, do hereby certify under penalty of perjury that the following facts are true:

1. I have been married to my husband, the Defendant Michael McMahon, since 1994.
2. On or about October 28, 2020 at approximately 6:00 A.M., approximately four or five FBI Agents arrived at my home in Mahwah, New Jersey and pounded at the front door, waking up me, my husband, Michael McMahon, and my son, Michael T. McMahon.
3. Through the windows on the front door and sidelights I saw flashlights. I could not see faces, but I heard loud voices stating: “Michael McMahon, open the door!!”
4. I was present with my son, Michael T. McMahon, in the upstairs living room when my husband, Michael McMahon, opened the door for the FBI Agents. My son, Michael T.

McMahon sat on a couch facing the front door approximately ten (10) feet away from the entrance, and I stood a few feet behind my husband.

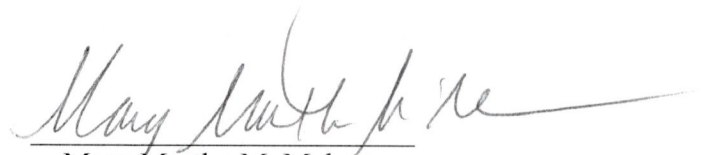
5. Shortly after my husband opened the door, I heard him ask the FBI Agents: "Is this about Paul Bergrin?"

6. In response, I heard FBI Agent Sean McCarthy say the word "board," but I could not make out the rest of what he said. I walked a few steps towards my son, Michael T. McMahon, in the living room. At this point, my son said to me: "Did you hear what he said?" I asked: "What did he say?" My son told me that Agent McCarthy told my husband, in response to his question regarding Paul Bergrin: "You've been on my board more than once." A female FBI Agent was approximately three (3) feet away from me and my son during this conversation. There was some other conversation as well, but is it not pertinent to this motion.

7. At this point, I sat on the couch across from my son, and my husband was taken down the hall to our bedroom to get dressed. When my husband returned, FBI Agents escorted my husband out of the front door without handcuffs.

I swear and subscribe to the foregoing statements made. I understand that if any of the foregoing statements made are false, I am subject to the penalty of perjury.

Date: August 8, 2022


Mary Martha McMahon